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January 20, 1998

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, D.C. 20554

RE: Ex Parte
Application by BellSouth Telecommunications, Inc. and BellSouth Long
Distance, Inc. for Provisioning of In-Region, interLATA Service in
Louisiana. CC Docket No. 97-231

Dear Ms. Roman Salas:

On Monday January 16, 1998, Ken McNeely, Steve Garavito, Jay Bradbury and I of AT&T met with Richard Metzger, Melissa Newman, Blaise Scinto, and Richard Lerner of the Common Carrier Bureau. The purpose of this meeting was to discuss the comments filed by AT&T in the aforementioned proceeding. Attached is a copy of the outline of the presentation distributed during the meeting.

Two copies of this Notice are being submitted on the following business day to the secretary of the FCC in accordance with Section 1.1206(a)(1) of the Commission's rules.

Sincerely,

Attachments

cc: R. Metzger M. Newman
B. Scinto R. Lerner

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BellSouth's Section 271 Application for Louisiana

Application by BellSouth Telecommunications, Inc., and BellSouth Long
Distance, Inc. for Authority to Provision In-Region, InterLATA
Services in Louisiana, CC Docket No. 97-231

PCS Providers in Louisiana Do Not Qualify as a Facilities-Based Competitors

- While PCS might one day be substitute for land-line service, it is not a substitute today.
 - Current PCS cost/price structure is comparable to cellular providers, not BellSouth's land-line network.
 - No evidence of significant consumer movement from BellSouth's network to PCS Networks.

BellSouth's Louisiana Application Should Fail for the Same Reasons As Its South Carolina Application

- BellSouth made no fundamental changes in its Operational Support Systems in the 37 day interval between filing South Carolina and Louisiana.
- BellSouth provided data on its same proposed performance measures as it did in South Carolina.
- BellSouth provided the same proposal for UNE combinations as it did in South Carolina.
- BellSouth refused to provide CSAs at wholesale discounts in Louisiana, just as it did in South Carolina.

No Fundamental Changes in Operational Support Systems

Pre-Ordering - LENS

- BellSouth made only cosmetic “work around” type changes in LENS but did not fix fundamental problems.
 - BellSouth gave two more pieces of information useful to calculate due date, but new entrants still have to manually calculate due dates unlike their BellSouth retail counterparts.
 - BellSouth gave additional ways to access customer service record information and available services/features, but did nothing to fix the problem of dual entry or the lack of integration of the pre-order/order process.
 - BellSouth issued new user guide in October which was immediately obsolete because BellSouth continues to make unilateral changes to LENS without prior notice or communication to new entrants.

No Fundamental Change to Operational Support Systems

Ordering - EDI

- While some changes improve initial “flow through,” those orders still fall out later to manual correction.
- Rejection notices remain manual/facsimile.
- Telephone number restrictions remain in place.

Performance Data

- BellSouth provided same performance and comparative measures as in South Carolina.
- The data submitted by BellSouth still shows discriminatory performance.
 - CLEC experience is consistently worse.
 - Only 39% of CLEC orders in September were “flowed through” without manual intervention.

Performance Data (cont.)

- Post-South Carolina data confirms that BellSouth still is not providing nondiscriminatory access to its OSS.
 - In October, AT&T gave BellSouth 8.54 days to provision consumer migration orders. BellSouth required 9.78 days to do so.
 - BellSouth missed 22% of AT&T requested consumer migration dates and 17% of its committed due dates in October, missing 46% of each the week of 10/20/97.
 - Of the missed requested due dates in October, 20% were five days or more late. Of the missed committed due dates, 15% were five days or more late.

BellSouth Has Provided The Same Proposal For UNE Combinations As It Did In South Carolina

- BellSouth is still requiring new entrants to collocate in BellSouth space.
- BellSouth has provided no implementation information on its ability to provide collocation.
- BellSouth has provided no methods or procedures for obtaining access to UNEs or how a new entrant can coordinate the provision of separate UNEs for combination.

BellSouth Refuses To Provide CSAs At Wholesale Discount In Louisiana, Just As It Did In South Carolina

- No wholesale discount on CSAs.
- Restriction of CSA to “same customers, same terms and conditions” is unreasonable.
- Termination penalties make CSA resale illusory.

BellSouth's Application Fails In Other Respects As Well

- The prices approved in Louisiana contain embedded costs.
- Loop rates are not geographically deaveraged.
- Unbundled local switching consistent with the Local Competition Order is still not available.